

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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JASON CAMACHO AND ON BEHALF OF	:	
ALL OTHER PERSONS SIMILARLY	:	Civil Action No. 1:18-cv-10694-KPF
SITUATED,	:	
	:	<b><u>NOTICE OF MOTION</u></b>
Plaintiff,	:	
v.	:	
	:	
VANDERBILT UNIVERSITY,	:	
	:	
Defendant.	:	
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**PLEASE TAKE NOTICE THAT**, upon the annexed Declaration of John W. Egan dated June 21, 2019, together with Exhibits “A” through “L” annexed thereto, Declaration of Thomas R. Crespo dated June 20, 2019, Declaration of Brent B. Tener dated June 20, 2019, Declaration of John O. Gaines dated June 20, 2019, Declaration of Susan Ryan dated June 21, 2019, together with Exhibits “A” and “B” annexed thereto, and the Memorandum of Law in Support of Defendant’s Motion to Dismiss, Defendant Vanderbilt University hereby moves for an Order dismissing all claims for relief set forth in the Second Amended Complaint *with prejudice* based on the absence of personal jurisdiction pursuant to Fed. R. Civ. P. 12(b)(2) and subject matter jurisdiction pursuant to Fed. R. Civ. P. 12(b)(1).

Dated: New York, New York  
June 24, 2019

Respectfully submitted,

SEYFARTH SHAW LLP

By: /s/ John W. Egan

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*Pro Hac Vice* to be filed

*Attorneys for Defendant  
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